

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHT RESPONSE, LLC
F/K/A POLARIS IP, LLC,

Plaintiff,
v.

GOOGLE INC., ET AL.,

Defendants.

§
§
§
§
§

No. 2:07-cv-00371-CE

Jury Demanded

**JOINT MOTION TO EXTEND DEADLINES REGARDING
GOOGLE'S MOTION FOR PROTECTIVE ORDER [DKT #164]**

Plaintiff Bright Response, LLC (“Bright Response”) and Defendant Google Inc. file this Joint Motion to Extend Deadlines Regarding Google’s Motion for Protective Order Barring Discovery of Google’s First Amendment Privileged and Irrelevant Lobbying Activities (“Motion for Protective Order”) [Dkt #164].

Defendant Google has requested an extension of time to file its Reply brief in regard to the Motion for Protective Order. Plaintiff Bright Response has agreed to extend that deadline to December 18, 2008.

Plaintiff Bright Response has requested and extension of time to file its Sur-Reply brief in regard to the Motion for Protective Order. Defendant Google has agreed to extend that deadline to January 2, 2009.

Accordingly, Defendant Google respectfully requests that it be granted an extension of time to file its Reply brief in regard to the Motion for Protective Order to December 18, 2008.

Plaintiff Bright Response respectfully requests that it be granted an extension of time to file its Sur-Reply brief in regard to the Motion for Protective Order to January 2, 2009.

DATED: December 15, 2008

Respectfully submitted,

By /s/ Jennifer Parker Ainsworth

Jennifer Parker Ainsworth
Texas State Bar No. 00784720
jainsworth@wilsonlawfirm.com
WILSON, ROBERTSON & CORNELIUS, P.C.
P.O. Box 7339
Tyler, Texas 75711
Telephone: (903) 509-5000
Facsimile: (903) 509-5092

Charles K. Verhoeven, *pro hac vice*
charlesverhoeven@quinnmanuel.com
David A. Perlson, *pro hac vice*
davidperlson@quinnmanuel.com
Jennifer A. Kash, *pro hac vice*
jenniferkash@quinnmanuel.com
Antonio Sistos, *pro hac vice*
antoniosistos@quinnmanuel.com
Jamenia Scott-Pirone
jamenapirone@quinnmanuel.com
QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP
50 California Street, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Andrea P. Roberts, *pro hac vice*
andreaproberts@quinnmanuel.com
Brian C. Cannon, *pro hac vice*
briancannon@quinnmanuel.com
QUINN EMANUEL URQUHART OLIVER & HEDGES
555 Twin Dolphin Drive, Suite 560
Redwood Shores, CA 94065
Telephone: 650-801-5000
Facsimile: 650-801-5100

COUNSEL FOR DEFENDANT GOOGLE INC.

DATED: December 15, 2008

Respectfully submitted,

By /s/ Andrew W. Spangler
(by permission, Jennifer Parker Ainsworth)

Andrew W. Spangler – LEAD COUNSEL
SPANGLER LAW P.C.
208 N. Green Street, Suite 300
Longview, Texas 75601
Telephone: 903-753-9300
Facsimile: 903-553-0403
spangler@spanglerlawpc.com

Jonathan T. Suder
Michael T. Cooke
Karolyne H. Cheng
FRIEDMAN, SUDER & COOKE
604 East Fourth St., Ste. 200
Fort Worth, Texas 76102
Telephone: 817-334-0400
Facsimile: 817-334-0401
jts@fsclaw.com
mtc@fsclaw.com
cheng@fsclaw.com

David M. Pridham
LAW OFFICE OF DAVID PRIDHAM
25 Linden Road
Barrington, Rhode Island 02806
Telephone: 401-633-7247
Facsimile: 401-633-7247
david@pridhamiplaw.com

Daniel F. Perez
THE PEREZ LAW FIRM
6131 Park Lane
Dallas, Texas 75225
Telephone: 214-289-6659
Facsimile: 214-521-1128
dan@pereziplaw.com

John J. Edmonds
THE EDMONDS LAW FIRM, PC
709 Sabine Street
Houston, Texas 77007
Telephone: 713-858-3320
Facsimile: 832-415-2535
johnedmonds@edmondslegal.com

COUNSEL FOR PLAINTIFF BRIGHT
RESPONSE, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this answer was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on this the 15th day of December, 2008.

/s/ Jennifer Parker Ainsworth
Jennifer Parker Ainsworth